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BY ECF

January 26, 2022

Hon. Pamela Chen
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: USA v. Mustafa Goklu
19-CR-386

Your Honor:

I represent Mustafa Goklu in the above-referenced matter. I am writing to request that the trial of this matter, currently scheduled for February 28, 2022, be postponed. Since our status conference on January 6, 2022, I have received discovery items turned over to prior counsel in July, 2021 but unknown to me (there was no discovery letter on the docket) and a subsequent discovery production on January 20, 2022. The July discovery contained approximately 2 TB of data. My associate counsel, Emilee Sahli, and I have been working through this material as quickly as possible, but do not believe we can fully and adequately identify, understand and organize the material that we will need to present our defense in the time remaining before the scheduled trial.

I would request a status conference to discuss rescheduling Mr. Goklu's trial, by phone, videoconference, or in person, as soon as possible, and as convenient to the Court. Thank you for your consideration.

Very truly yours,

/s/
Murray Singer

cc: AUSA Gillian Kassner by ECF and email